

DOCKET FILE COPY ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED

APR 19 1994

MAIL BRANCH

In the matter of

Amendment of the Amateur Service Rules ) PR Docket 93-305  
to Implement a Vanity Call Sign System )

COMMENTS OF THE HILL COUNTRY AMATEUR RADIO CLUB  
601 Water St.  
Kerrville, TX 78028

### Background

The Hill Country Amateur Radio Club is an ARRL affiliated club of about one hundred members. Our base is Kerrville, Texas, a city with a population of approximately 17,500 located 65 miles northwest of San Antonio. Our area is a popular retirement area and many of our members are "senior citizens", many of them newly licensed amateurs. We also have quite a few young members and conduct regular amateur training classes and testing sessions under the W5YI VEC.

### Summary

The purpose of our comments is to suggest modifications to the Notice of Proposed Rule Making (NPRM) which would provide individual licensed amateurs the opportunity to obtain call signs of their choosing, provided that the call is available and the licensee has a grade of licensee appropriate to issuance of the requested call sign. Comments are also offered on the subject of fees.

The Hill Country Amateur Radio Club supports the basic provisions contained in the NPRM, but suggests alternatives specifically applicable to club stations. In particular, we urge that applicants for new club stations be able to request an available call sign of their choosing, rather than having to wait and so apply after they receive a sequentially issued call sign.

With respect to fees, we believe that the charge should be a one-time-only (not charged at renewal), and that it should be in line with the Commission's costs and the ability of moderate and low income amateurs to pay.

### Detailed Comments

As noted in the NPRM, an amateur's call sign is, for radio matters, the primary indicator of his or her identity. For example, while many thousands of radio amateurs might "recognize" an amateur by call sign, only a relative handful of these would ever be likely to know that person by his or her "proper" name.

No. of Copies rec'd 048  
List ABCDE

For many radio amateurs, the opportunity to obtain a call sign of their choosing would be highly attractive. History shows that this was true whenever the opportunity was available.

Under the Commission's Rules, as they existed in the past, any licensed amateur could obtain an unassigned call sign of which he or she had been the most recent former holder. This privilege was, of course, restricted to those holding a class of license appropriate to the call sign being requested. In addition, Commission practice typically enabled the assignment of "counterpart" call signs in cases where amateurs moved from one call area to another; provided, of course, that a requested call sign was unassigned. We propose that this practice be revived for all licensed amateurs.

For many years, bona fide club stations could obtain "memorial" call signs of deceased members, with each such station being required to have a trustee holding the appropriate class of license. The Commission has since discontinued the issuance of new club station licenses while continuing to renew those already in existence. The NPRM proposes to re-institute the licensing of club stations, but proposes to issue only sequential call signs to such stations. However, the NPRM also states that existing club stations can apply for a specific call sign. Presumably, this means that, once licensed, a newly licensed club could then request a specific call sign. This means that a new club station must first obtain a sequential call sign and then apply for the specific call it desires. This seems very ponderous and not a good use of both the Commission's and the licensee's time and effort. It is also very unfair to newer clubs which have been precluded from obtaining club licenses for many years.


For these reasons, we urge that clubs applying for a new club license be given the opportunity to apply for a specific call sign on the same basis as individuals or existing club licensees. If none of the calls requested by the club are available, it should be issued a sequential call sign. Of course, issuance of a specific call sign to a club must be predicated on the trustee having the appropriate class of license. Additionally, that person should not lose his or her own call sign as a result of acting as trustee for a club.

In some countries, e.g., the United Kingdom, it is possible for an individual to obtain a "memorial" call sign of which a deceased family member was the most recent holder, as long as that individual is otherwise qualified to hold that call sign. We urge that such a provision be adopted in the U.S. Furthermore, a person applying for the call sign of a deceased close relative should be able to do so immediately upon proof of death, without the two year waiting period prescribed in the NPRM. Among other advantages, this gives the family member a priority over non relatives in securing that call sign. If more than one close family member applies for the same call sign, we believe that the Commission should honor the application of the

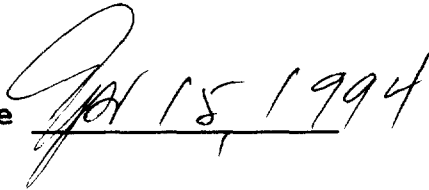
one whose application arrives first. This procedure would avoid the Commission's entering into a debate over "closeness of relationship". We suggest that, for this purpose, "close relative" be defined as and limited to: wives/husbands, brothers/sisters (including steps), fathers/mothers (including steps and halves) and sons/daughters (including steps).

We feel that the fee associated with requests for "vanity" call signs must not be high enough to represent a deterrent to amateurs who may not be well fixed financially. This is especially true of many older and physically handicapped hams. A large proportion of our club members are retired on fixed incomes and must be very careful of their expenditures. Once the appropriate computer system is installed, the Commission should be able to administer the new procedure at a relatively low cost. It would appear that the fee should be levied only to cover the extra cost of initially issuing a requested call sign. No such extra cost would be entailed at renewal. It would appear that a one-time fee of perhaps \$25 to \$50 would be more than adequate to cover the extra cost of operating this program. We believe that a "user fee" in excess of the actual extra cost to the Commission would simply be a tax by another name; to which our club members, and we assume most radio amateurs, are strongly opposed. It is our understanding that the enabling legislation presently requires the collection of an annual fee (not an application fee) covering not only the initial period of a license with a "vanity" call sign, but also renewal periods. Clearly, this provision has nothing to do with the Commission's costs and is, therefore, a tax. We urge the Commission to request Congress to enact whatever legislation is necessary to allow the Commission to recoup its cost of processing "vanity" call sign applications through a system of reasonable one-time-only fees.

Respectfully submitted,

  
A.B. Bates WOHVL  
President

Date

  
APR 15 1994